

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

K.C., on behalf of herself and all others
similarly situated, *et al.*,

Plaintiffs,

v.

Richard Nedelkoff, in his official capacity as
Conservator of the Texas Youth Commission,
et al.,

Defendants.

Civil No. 6:09-CV-012-C

Hon. Sam R. Cummings

**DECLARATION OF DEBORAH
LABELLE**

I, DEBORAH LABELLE, certify under penalty of perjury that to the best of my knowledge and recollection, the following is true and correct:

1. I am an attorney in private practice based in Ann Arbor, Michigan, and am counsel for Plaintiffs and the putative class in the above-captioned case.
2. The documents attached as exhibits to this declaration were provided to me by Defendants' counsel, Bruce Garcia, before the issuance of Plaintiffs' first request for production of documents for the purposes of friendly settlement discussions.
3. Plaintiffs' counsel conferred with Mr. Garcia, who indicated that he did not have a problem with our use of these exhibits in coordination with this motion.
4. The attached documents are the reports prepared monthly for the Texas Youth Commission, documenting any incident in which a girl confined at Ron Jackson Juvenile Correctional Complex in Brownwood, Texas ("Brownwood") engages in alleged behavior requiring staff to complete an incident report form.
5. All factual statements regarding the disciplinary histories of girls confined at Brownwood made in Plaintiffs' second renewed motion for class certification are based on information and data contained in the attached exhibits.

Executed this 8th day of April, 2009, in Ann Arbor, Michigan.

/s/ Deborah LaBelle
Deborah LaBelle